

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA	§	
ex rel. TIFFANY MONTCRIEFF,	§	
ROBERTA MARTINEZ, and ALICIA	§	
BURNETT,	§	
	§	
Plaintiffs,	§	Civil Action No. SA-17-CV-00317-XR
	§	
v.	§	
	§	
PERIPHERAL VASCULAR	§	
ASSOCIATES P.A.,	§	
	§	
Defendant.	§	

**UNITED STATES’ STATEMENT OF INTEREST**

Although the government did not intervene in this case and is not a party, the government remains the real party in interest. *See* 31 U.S.C. § 3730(d). The government submits this statement of interest to notify the Court about an issue raised by Defendant Peripheral Vascular Associates, P.A. (PVA). *See* 28 U.S.C. § 517 (authorizing statements of interest).

In PVA’s Motion to Reconsider Granting of Relators’ Motions in Limine (Dkt. 175), PVA referenced a meeting on August 22, 2018. One of the attendees was Tomas Gonzales, a Special Agent with the U.S. Department of Health and Human Services, Office of Inspector General (HHS-OIG). After the meeting, Mr. Gonzales prepared a Report of Investigation Activity about the meeting.

Yesterday evening, counsel for the United States confirmed that on November 25, 2019, HHS-OIG produced this Report of Investigation Activity to PVA in response to a request under the Freedom of Information Act. For the Court’s benefit, the government submits HHS-OIG’s response to PVA’s FOIA request including the Report. *See* Exhibit 1 at 23.

Dated: February 4, 2022

Respectfully submitted,

ASHELY C. HOFF  
United States Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 4, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to:

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